

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**STATE DEFENDANTS' NOTICE OF FILING  
REGARDING THE COURT'S REQUEST FOR DOCUMENTATION**

Pursuant to the Court's September 30, 2020 docket entry, the State Defendants file this response. As raised in the September 28, 2020 Conference with the Court and previously noted in the docket at [Doc. 895], the State Defendants maintain their objection to this continued inquiry into the details of election administration. State Defendants further respectfully note that this inquiry continues to impede administration of the November 2020 election by diverting resources to the Court's questions. The State's EAC-certified Voting System Test Laboratory, Pro V&V, has completed its evaluation of the software update and confirmed that evaluation with the Secretary, but a formal report of that process has not yet been prepared.

State Defendants anticipate receiving that report within the next few days and will then file it.

Respectfully submitted this 30th day of September 2020,

/s/ Vincent Russo

Vincent R. Russo

Georgia Bar No. 242628

vrusso@robbinsfirm.com

Josh Belinfante

Georgia Bar No. 047399

jbelinfante@robbinsfirm.com

Carey A. Miller

Georgia Bar No. 976240

cmiller@robbinsfirm.com

Alexander Denton

Georgia Bar No. 660632

adenton@robbinsfirm.com

Robbins Ross Alloy Belinfante Littlefield LLC

500 14th Street, N.W.

Atlanta, Georgia 30318

Telephone: (678) 701-9381

Facsimile: (404) 856-3250

Bryan P. Tyson

Georgia Bar No. 515411

btyson@taylorenghish.com

Bryan F. Jacoutot

Georgia Bar No. 668272

bjacoutot@taylorenghish.com

Diane F. LaRoss

Georgia Bar No. 430830

dlaross@taylorenghish.com

Loree Anne Paradise

Georgia Bar No. 382202

lparadise@taylorenghish.com

TAYLOR ENGLISH DUMA LLP

1600 Parkwood Circle, Suite 200

Atlanta, GA 30339  
Telephone: 678-336-7249

*Counsel for State Defendants*

**CERTIFICATE OF COMPLIANCE**

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing **STATE DEFENDANTS' NOTICE OF FILING REGARDING THE COURT'S REQUEST FOR DOCUMENTATION** has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Vincent Russo  
Vincent Russo